BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2006-1-E

N THE MATTER OF:	n tip j
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Carolina Power & Light Company d/b/a) PETITION TO INTERVENE
Progress Energy Carolinas, Inc.) BY NUCOR STEEL –
Annual Review of Base Rates for) SOUTH CAROLINA
Fuel Costs	1

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-836 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

- 1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Progress Energy Carolinas, Inc. ("Progress Energy") (formerly known as Carolina Power & Light Company ("CP&L")), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars a year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.
- 2. This docket has been established to review Progress Energy's historical and projected fuel costs and to determine the appropriate fuel factor for the next twelve months. Nucor is concerned about the impact of Progress Energy's fuel costs on its rates and those of other customers. Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this early stage of the proceeding, Nucor has not fully determined what position it may take and how long it will take to complete its presentation and any cross-examination during the public hearing established in this proceeding. In general, however,

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Nucor is concerned with ensuring that Progress Energy's fuel factor is set at the proper level. Since 1987, Nucor has actively participated in many previous Progress Energy and CP&L fuel and rate proceedings before this Commission.

3. Nucor's mailing address is:

Nucor Steel – South Carolina P.O. Box 525 Darlington, SC 29532

4. Nucor will be jointly represented in this proceeding by the firms of Brickfield, Burchette, Ritts & Stone, P.C and Moore & Van Allen, PLLC. Brickfield, Burchette, Ritts & Stone, P.C. represents Nucor in matters regarding electric rates and service in jurisdictions throughout the United States. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 S(1)(b) of the Commission's Rules of Practice and procedure, for the purposes of this proceeding, Brickfield, Burchette, Ritts & Stone, P.C. is associated with the firm of Moore & Van Allen, PLLC, whose attorneys are licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to both the undersigned firms.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

Thomas S. Mullikin Robert R. Smith II

100 North Tryon Street Suite 4700 Charlotte, North Carolina 28202 (704) 331-1000 (704) 339-5870 (fax)

tommullikin@mvalaw.com robsmith@mvalaw.com

BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.

Garrett A. Stone

1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007 (202) 342-0800 (202) 342-0807 (Fax)

gas@bbrslaw.com

Counsel for Nucor Steel – South Carolina

Dated: February 2006

BEFORE THE

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2006-1-E

IN THE MATTER OF:)	
)	
Carolina Power & Light Company d/b/a)	
Progress Energy Carolinas, Inc.	CERTIFICATE OF SERVICE
Annual Review of Base Rates for)	
Fuel Costs)	

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail, telefax, or Federal Express on this the day of February, 2006:

Florence P. Belser, Esq. Nannette S. Edwards, Esq. Wendy B. Cartledge, Esq. Office of Regulatory Staff Post Office Box 11263 Columbia, SC 29211

Len S. Anthony, Esq.
Progress Energy Carolinas, Inc.
d/b/a Carolina Power & Light Company
411 Fayetteville Street Mall
P.O. Box 1551
Raleigh, NC 27602

Scott Elliott, Esq. SC Energy Users Committee Elliott & Elliott, PA 721 Olive Street Columbia, SC 29205

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Robert R. Smith II